

**Illinois Commerce Commission**  
**SBC/Ameritech Illinois Merger, Docket 98-0555**  
**Performance Benchmarks Collaborative, Condition 30**  
**Final Meeting Minutes From 1/18-19/2000**  
Modified and Approved 2/15/2000

The second Illinois Performance Measure collaborative was held on January 18 and 19, 2000 at the State of Illinois Center in Chicago, Illinois. Below are the minutes from that meeting.

Mr. McClerren, ICC Staff, presided over the meeting.

**January 18, 2000**

Meeting Purpose

Mr. McClerren emphasized that the meeting should be a collaborative effort and again read the requirements of SBC/Ameritech merger condition #30.

Administrative Matters

- Review of the Minutes from January 6, 2000 Meeting

Mr. McClerren provided the group with copies of the minutes from the January 6, 2000 meeting of the Collaborative. The group was polled for comment and the following paragraph was changed at the request of AT&T and SBC/Ameritech. Changes have been noted in bold. No other comments were received.

"AT&T asked whether the statistical modified z-test, which is used in the Texas plan to evaluate actual results **for parity and benchmark measures**, would be part of the initial performance measurements implementation. Mr. Fioretti stated that the initial deployment would include the use of the z-test **for both types of measures as is done in Texas**. AT&T wanted to discuss the appropriateness of the z-test **with benchmark measures** within the 60-day timeframe. AT&T did not agree with the application of the statistical test to a benchmark and asserted that SBC/Ameritech was picking and choosing which parts of the Texas plan to implement."

The revised paragraph will be inserted into the minutes of the January 6, 2000 meeting and will be posted to the ICC web site. It will be noted that

these minutes were reviewed and approved at the January 18, 2000 meeting of the collaborative.

### Schedule and Agenda Items

AT&T requested that two additional issues be added to the agenda for future discussion:

1. Procedures for resolving differences when the parties cannot agree on whether a measure should have a parity or benchmark standard.
2. Issues with respect to FCC measures and how data is made available on the web site.

Mr. Fioretti then asked if he could update the team on the Implementation Schedule. Mr. Fioretti stated that the correct schedule has been posted to the web site. He indicated that the state measures scheduled for delivery on January 20, 2000 were on target.

Mr. Fioretti proposed moving delivery of the new measures being introduced each month to the 22nd day of the month rather than the 20th as initially indicated on the schedule. This would apply only to measures that are being posted for the first time. Mr. Fioretti asked if this was acceptable to the group. He indicated that the additional two days would give his team an opportunity to post the new measures after insuring that the regularly scheduled measures due on the 20th were accurately posted. No one in attendance opposed the proposal so it was adopted. Mr. Fioretti indicated that a revised schedule showing this change would be posted to the web site.

#### ▪ Technically Infeasible Measures

Mr. Fioretti then reviewed the list of Technically Infeasible measures that was distributed at the January 6, 2000 meeting. He stated that EASE is not currently deployed in the Ameritech region and there is not an existing equivalent system in Ameritech. Mr. Fioretti stated that if EASE or an equivalent system were deployed a performance measure would then be developed. There was no objection from the group so it was agreed that this measure is infeasible at this time.

Next Mr. Fioretti reviewed the INP measures and stated that INP is no longer being deployed in the Ameritech region therefore these measures are not viable. There was no objection from the group so it was agreed that these measures are infeasible.

Mr. Fioretti noted that the list of Technically Infeasible measures would be set aside until SBC/Ameritech makes its filing in conjunction with this proceeding.

Mr. McClerren noted that all parties were in agreement about the designation of “technically infeasible” regarding Texas measures numbered 3, 87, 88, 89, 90 and 116.

- Parity vs. Benchmark Discussion

Mr. Fioretti reviewed the four categories of measures and he explained why measures were placed in a given category. MCI indicated that three measures were not included on the document and provided a fax copy of the measures. Upon review it was determined that these measures were part of a later version of the 1.6 Texas Business Rules, not the July 20, 1999 version that the group is working from. Mr. McClerren indicated that these additional measures as well as the measures agreed to in the Indiana collaborative would be discussed within the context of this collaborative but would not impact whether or not SBC/Ameritech met its merger commitments.

(1) Parity by Design

Mr. McClerren then moved that the group begin discussion of the measures categorized in the January 6 document as “Parity by Design”.

The discussion concluded with the group requesting that measures 71, Common Transport Trunk Blockage, be discussed further on the second day of the collaborative. The group agreed that benchmarks would be used for measures 79-86 which address directory assistance and operator services.

AT&T stated that SBC has committed to report measures 79-86 by separately CLEC and SBC if the network changes or the way calls are treated allows for distinction between retail and wholesale customers. Mr. Fioretti concurred.

Sprint expressed concerns on branding of calls. Mr. Fioretti indicated that if branding allowed SBC/Ameritech to distinguish between retail and wholesale calls he would look at the impact on measurements and make the necessary changes.

MCIWorldCom asked what benchmark would be adopted for measures #79-86. Mr. Fioretti stated that the benchmarks from the July 20, 1999 version of the Texas Business Rules would be used. MCI expressed a desire to open a discussion targeted on modifying these benchmarks. Mr. Fioretti stated that this discussion was intended to focus only on whether there should be a parity comparison or a benchmark, not to evaluate the Texas benchmarks. He suggested that a similar discussion focusing on modifying the Texas benchmarks could be held at another time.

## (2) Diagnostic

Mr. Fioretti then reviewed the measures categorized as diagnostic. According to the July 20, 1999 version of the Texas Business Rules these measures have no penalties and in some cases, no benchmarks associated with them.

After reviewing the measures it was agreed the measures #9, 20 and 72 would be implemented with benchmarks. The CLECs requested that measures #6, 8, 34, 51 and 64 be discussed in greater detail on the following day.

The CLECs stated that they do not see these measures as diagnostic and are concerned that the results of the measures give them information key to running their businesses. They also stated that the cancelled order measures are of particular interest since they are not included in any of the other measures per the Texas Business Rules.

## (3) Under Investigation

Mr. Fioretti stated that for these measures he has done additional research since the January 6, 2000 meeting and is prepared to offer parity comparisons for all the measures in this category. The retail analog for these measures would be taken from the retail analogs specified in other measures in the Texas Business Rules or if none existed SBC/Ameritech would propose one. However, he identified items of concern relating to measure #19, 77, 107, 108 and 109.

For measure #19, Daily Usage Feed Timeliness, if a parity comparison were to be implemented a process change would be required. Mr. Fioretti stated that currently the CLECs receive aggregated daily usage files. In order for a parity comparison to be implemented, the daily usage process for the CLECs would change such that the additional steps on the wholesale side to aggregate the usage would be eliminated. SBC/Ameritech would then send the CLECs as many as 13 separate daily usage files rather than the single aggregate file currently transmitted. The CLECs requested time to review this proposal with their SMEs prior to expressing an opinion on this measurement.

For measure #77, Average Trunk Restoration for Service Affecting Trunk Groups, Mr. Fioretti stated that due to low volumes of retail and CLEC data for this measure, it would be difficult to implement a meaningful comparison. Based on this discussion the CLECs agreed that a benchmark was appropriate for this measure.

For measures #107-109, Collocation measures, Mr. Fioretti stated that he had concerns that there might not be sufficient volumes of affiliate data in all the disaggregation categories to compare to the CLEC data. Sprint suggested that the benchmark should remain in place but that the affiliate data should be shown and that either the affiliate result or the benchmark, whichever is more stringent, should be the standard against which CLEC performance is measured. Mr. Fioretti suggested that the affiliate outcome data could be presented separately, but that he did not agree with holding SBC/Ameritech to the more stringent of the two standards. It was agreed to re-visit this item on the following day.

#### (4) No Retail Analog

Mr. Fioretti stated that for these measures he was not able to find a comparable retail analog. AT&T stated that their position was that Ameritech had the burden of proof to show that no retail analog exists and the AT&T was expecting a retail analog on these measures. Sprint and Gabriel Communications stated that they expected to see the SBC/Ameritech affiliate data for all these measures.

For measures #1, 2, 4, 10, 10.1, 10.2, 10.3, 11, 11.1, 11.2, 15, 91, 92, 95, 96, 97, 100 and 101 the group concurred that implementing a benchmark was appropriate. It was agreed that measures 5, 7, 7.1, 16, 94, 105, 106, 110-115 and 120 and 121 would be discussed further on the next day.

The CLECs requested that Mr. Fioretti investigate the equivalent retail processes in greater detail for measures 105, 106, 110-115 and 120 and 121. The CLECs indicated that they believed that these measures had retail analogs.

Mr. Fioretti agreed to update the parity vs. benchmark document for the group and bring a revised copy to the meeting for review on the following day.

Sprint went on record to say that it disagreed with the position that benchmarks levels are outside the 60-day initial period of discussion. Sprint asked that it be reflected in the minutes that they believe the discussion of benchmark level should occur within the 60 days.

Mr. Fioretti stated that it is not necessary to discuss the benchmark levels within the 60 days to meet the merger commitments.

Mr. McClerren stated that per condition #30, discussion of the benchmark levels could occur outside the 60-day window.

AT&T asked Mr. Fioretti to clarify the next steps that would be taken. Mr. Fioretti stated that he envisioned that the group would meet at least once more prior to filing its written report detailing the timeline for implementing each of the measures. SBC/Ameritech would file a document outlining those measures for which a benchmark or parity was agreed upon. Mr. Fioretti stated that he hoped that the group could reach closure on a benchmark or parity for all the measures. He stated that his plans for measures that the group cannot reach closure on are not yet decided. He may or may not file a petition on those measures.

AT&T asked Mr. Fioretti how much time he would need prior to making his filing. He stated that he would need to close on the items by mid-February.

The group adjourned and agreed to reconvene on the following day at 9:00 AM.

### **January 19, 2000**

Mr. McClerren opened the meeting by stating that it is the desire of the Commission that the parties involved in the collaborative work to resolve all open items. He asked that the group be creative and flexible in looking for solutions. Mr. McClerren also suggested that it would likely be the preference of the Commission that no formal resolution be requested of them on the matter of performance measurements. Mr. McClerren stated that parity vs. benchmark is the remaining issue to be resolved and everyone needs to be thinking of what is reasonable. Mr. McClerren recommended that if CLECs believe there is a parity comparison for a measure they should submit their proposed analog to the group for review.

It was decided that the group would meet next on February 15-16, 2000. The meeting will begin at 11:00 am on February 15, 2000. Mr. McClerren will provide the group with the location at a later time.

Mr. Fioretti distributed a revised copy of the parity vs. benchmark document, showing whether the group had agreed to parity, a benchmark or needed to discuss the measure further.

Upon review of the document AT&T stated that the discussion of collocation measures had been misunderstood and incorrectly documented. AT&T stated that they desired parity on measures #107-109 (Collocation), not a benchmark.

A discussion on the collocation measures ensued with the following as major issues:

- Would there be sufficient affiliate data in all categories to provide a meaningful parity comparison?
- Is it appropriate to have both a benchmark and parity with the affiliate as a standard for this measure?
- Can the CLECs request to move this measure to a parity comparison later in the process if a benchmark is agreed to now?
- What are the historical and projected volumes for SBC/Ameritech's affiliate?
- Would additional disaggregations be included in the measures as products are offered, for instance, collocation at remotes?

After much discussion the CLECs were unable to settle on a single position as to whether a benchmark or parity should be implemented for measures #107-109. Mr. Fioretti agreed to leave the offer of implementing either parity with the SBC/Ameritech affiliate or the Texas benchmarks open for these measures. Mr. Fioretti also agreed to verify what affiliate data is currently available and can be shared with the group.

No other discrepancies with the parity vs. benchmark document were identified.

- Measures to "Discuss"

Mr. Fioretti opened the floor to discussion of the measures listed on the parity vs. benchmark document as "discuss". The following is a summary of that discussion.

Measure #71, Common Transport Trunk Blockage. At the request of the CLECs, Mr. Fioretti is to verify if there are any trunk groups that are dedicated to transporting only SBC/Ameritech traffic between SBC/Ameritech central offices. If there are no such trunk groups then a benchmark would be acceptable for this measure.

Measures #34, 51, 64, Canceled Orders. The CLECs suggested that a parity analog could be found for these measures. Nextlink is to provide the group with a summary of a proposed analog. AT&T stated that they could accept a benchmark for these measures if the data on canceled orders was included in other provisioning measures. Mr. Fioretti will conduct further investigation into parity analogs for these measures and give feedback at the next meeting.

Measure #19, Daily Usage Feed Timeliness, AT&T and MCI indicated that they needed additional time to review Mr. Fioretti's proposal for parity which included a process change to send out multiple DUF files. The CLECs will state their preference for a benchmark or parity at the next meeting.

Measure #16, Percent of Usage Records Transmitted Correctly. Mr. Fioretti agreed to bring additional information about the definition of this measure and potential retail analogs to the next meeting.

Measures #105-106, Poles, Conduits and Right of Way. Mr. Fioretti stated that it might be possible to provide a parity comparison on this measure using affiliate data. There is some potential however, that there would be occasions that not enough data exists for a valid comparison to be made. Nextlink suggested that retail data is also available. Mr. Fioretti will check on the comparability of retail data and report at the next meeting.

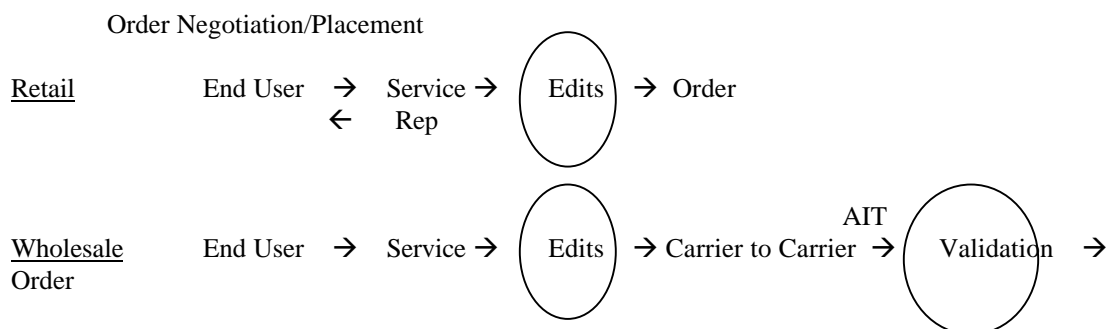
Measures #110-113, Directory Assistance Database. Mr. Fioretti agreed to look at the electronic processes further and determine if a retail analog could be found when electronic requests were sent. He will provide a read-out at the next meeting.

Measures #114-115, Coordinated Conversions. Corecom requested a clarification on the differences between measures 96 and 114. Mr. Fioretti agreed to clarify at the next meeting. Nextlink suggested that a retail analog does exist for these measures. Nextlink will forward their proposal and submit it to the group for comment.

Measures #120-121, Bona Fide Request Process. The CLECs suggested that retail analogs exist for these measures. They cited SBC/Ameritech's practices for building out new plant as a possible analog. Mr. Fioretti agreed to investigate these analogs and report back at the next meeting.

Measures #5, 6, 94, Firm Order Confirmations (FOCs) and measures #7, 7.1, 8, Completion Notifications

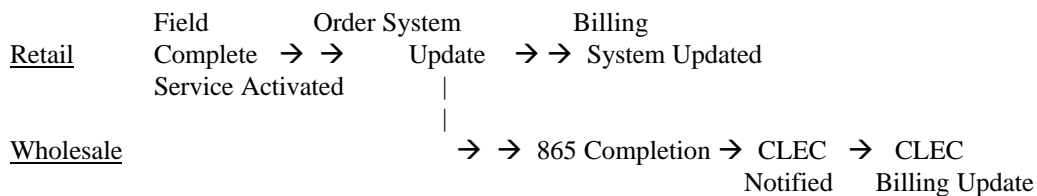
The group engaged in a discussion directed at whether or not there was a retail analog for FOC and Completion Notifications. Mr. Fioretti began by drawing a diagram to explain why he believes there is no retail analog for the FOC measures. The diagram depicted the additional steps that are required in the wholesale process that are not present in the retail process due to the carrier to carrier relationship. Thus, there is no retail analog. Mr. Fioretti stated that a FOC exists by virtue of this carrier to carrier relationship in the wholesale marketplace and that no FOC exists in the retail world.





The CLECs disagreed with Mr. Fioretti's position and requested that he bring additional information back to the team on which items are validated prior to a FOC being sent. AT&T indicated that some information that Mr. Fioretti was providing was in conflict with data being provided at SBC/Ameritech CLEC Forums. Mr. Fioretti agreed to get more information from the SBC/Ameritech IT group and bring it back to the group. It was agreed that FOCs would be discussed at the next meeting.

The discussion moved on to completion notification and again Mr. Fioretti drew a diagram to explain the completion process for the CLECs and SBC/Ameritech retail. The diagram depicted the additional steps which are specific to the carrier to carrier relationship, and that there was no specific "completion notification" process for retail. AT&T suggested that the appropriate end point for this measure should be when SBC/Ameritech updates its billing systems. Mr. Fioretti agreed to investigate the feasibility of measuring to this point and report back at the next meeting.



#### ▪ Other Items

AT&T brought up an issue relating to the reports as delivered on the FCC web site. It averred that the information is not in an easily usable format for the CLECs. It was stated that the data is too cumbersome and requires the downloading of multiple spreadsheets to do comparative analysis. Mr. Fioretti stated that it was not SBC/Ameritech's intent to deliver the state reports in the same format as the FCC reports, and that the format provided on the web-site was a result of miscommunication. SBC/Ameritech's intent is to provide data as it is provided in Texas and will follow up to ensure that the format is modified to coincide with that provided in Texas. AT&T responded that the Texas format is better, but could also be easier to deal with. Mr. Fioretti stated that he would investigate the possibility of making the data accessible in a format closer to that which AT&T desired. However, he could not promise that any changes could be made within the timeframe for delivering on SBC/Ameritech's merger commitments..

Mr. McClerren concluded the meeting by reminding the parties to furnish any documents to him no later than February 7, 2000 for posting to the ICC web site.